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National Collegiate Athletic Association,
National Basketball Association, National
Football League, National Hockey League, and
Office of the Commissioner of Baseball doing
business as Major League Baseball

NATIONAL COLLEGIATE ATHLETIC
ASSOCIATION, *et al.*,

Plaintiffs,

v.

CHRISTOPHER J. CHRISTIE, Governor of the
State of New Jersey, *et al.*,

Defendants.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

:
:
: Civil Action No. 12-cv-4947 (MAS)(LHG)
: Hon. Michael A. Shipp, U.S.D.J.
: Hon. Lois H. Goodman, U.S.M.J.
:

: **MOTION DAY: December 18, 2012**
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: **NOTICE OF PLAINTIFF'S CROSS-**
: **MOTION TO SEAL ADDITIONAL**
: **DOCUMENTS**
:
:
:

To: Christopher S. Porrino
Assistant Attorney General
Director, Division of Law
Office of the Attorney General
Richard J. Hughes Justice Complex
25 Market Street, P.O. Box 080
Trenton, New Jersey 08625
Counsel for Defendants

PLEASE TAKE NOTICE that on December 18, 2012 at 1:00 p.m., or as soon thereafter as counsel may be heard, the undersigned, counsel for Plaintiffs National Collegiate Athletic Association, National Basketball Association, National Football League, National Hockey League, and Office of the Commissioner of Baseball doing business as Major League Baseball, shall apply to the United States District Court, District of New Jersey at the United States Courthouse, 402 East State Street, Trenton, New Jersey 08608, for entry of an Order pursuant to Local Civil Rule 5.3(c)(2) sealing the following documents: (1) exhibits 1, 2, 3, 7, 9, 17, 20, 21, 23, and 31 to the December 6, 2012 Certification of Richard Hernandez; (2) an unredacted version of Plaintiffs' Reply Brief in Support of their Motion for Summary Judgment and, If Necessary to Preserve the Status Quo, a Preliminary Injunction, and Brief in Opposition to Defendants' Cross-Motion for Summary Judgment; (3) an unredacted version of Plaintiffs' Reply Statement of Undisputed Material Facts Pursuant to Local Rule 56.1; and (4) an unredacted version of Plaintiffs' Response to Defendants' Statement of Undisputed Material Facts Pursuant to Local Rule 56.1.

PLEASE TAKE FURTHER NOTICE that in support of the motion we shall rely upon Plaintiffs' Brief in Further Support of Defendants' Motion to Seal and in Support of Plaintiffs' Cross-Motion to Seal Additional Documents, the Certification of Naima M. Stevenson of the National Collegiate Athletic Association in Further Support of Defendants' Motion to Seal Documents and in Support of Plaintiffs' Cross-Motion to Seal, the Certification of Daniel J. Spillane of the National Basketball Association in Further Support of Defendants' Motion to Seal Documents and in Support of Plaintiffs' Cross-Motion to Seal, the Certification of Lawrence P. Ferazani, Jr. of the National Football League in Further Support of Defendants' Motion to Seal Documents and in Support of Plaintiffs' Cross-Motion to Seal, and the

Certification of Jessica C. Berman of the National Hockey League in Further Support of Defendants' Motion to Seal Documents and in Support of Plaintiffs' Cross-Motion to Seal, submitted herewith.

PLEASE TAKE FURTHER NOTICE that a Proposed Form of Order and Findings of Facts is submitted with this motion.

McCARTER & ENGLISH, LLP

Dated: December 7, 2012

By: s/William J. O'Shaughnessy

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